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February 28, 2001

Ex Parte

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th St., S.W. – Portals
Washington, DC 20554

RE: Application by Verizon New England Inc., et al., for Authorization To Provide In-Region, InterLATA Services in Massachusetts, Docket No. 01-9

Dear Ms. Salas:

This letter responds to a number of recent questions from CCB Staff.

Performance Measures
Staff asked when Verizon would begin reporting measure PO-8-02 (Average Response Time – Engineering Record Request). Verizon expects to begin reporting this measure on the Carrier-to-Carrier reports with the March data month, assuming that there is any activity to report. If there is no activity, the reports will show NA.

Information in LFACS
Staff asked for a description of the information that exists in the Loop Facilities Assignment Control System (LFACS), and asked what information would be provided to CLECs through Verizon's interim and long-term access solutions. Attachment A lists the information LFACS maintains on a loop basis, and indicates what information will be returned to CLECs. The CLECs will receive the same information under both the interim and long-term solutions.

Staff also asked what information about digital loop carrier (DLC) in Verizon's network was available to Verizon personnel outside of LFACS. DLC information resides in several outside plant engineering subsystems outside of LFACS. LFACS is linked to these downstream subsystems and feeds DLC data to them for local loop planning and engineering purposes. As a result, these systems contain the same DLC information that is in LFACS. In addition, DLC information resides in the Trunk Inventory Record Keeping System (TIRKS). TIRKS contains DLC information that is input separately by Verizon network engineering personnel for the

purposes of maintaining central office equipment inventory. DLC equipment is categorized as central office equipment and therefore the DLC hardware is inventoried by TIRKS. Verizon does not use TIRKS to determine loop makeup information.

UNE Special Services

Staff asked Verizon why some of the performance measures for UNE special services disaggregate reported results for DS1s and other types of special services UNEs while others do not. Staff also asked whether other UNE special services measures could be disaggregated at this level. The Carrier-to-Carrier Guidelines in effect in 2000 required Verizon to report Average Interval Offered and Completed (PR-1 and PR-2 measures) separately for UNE DS0, DS1, and DS3. The new Guidelines approved by the New York Public Service Commission on December 15, 2000 adopted the Carrier-to-Carrier working group consensus to report an additional measure (PR-4-01, Percent Missed Appointment-Verizon-Total) for the same three UNEs. Verizon began to report this new breakdown for January data. Verizon cannot reliably disaggregate trouble report data (such as the trouble report rate – PR-2-01 – or Mean Time to Repair – MR-4-01) between various types of high-cap circuits. This is because, for example, a CLEC that purchases a DS3 from Verizon may use the individual DS1s making up the DS3 to serve several different customers. If one of the CLEC's customers reports trouble on its DS1, the CLEC may not know, or may not accurately report to Verizon, whether the trouble is on the entire DS3 circuit or just the individual DS1. As a result, Verizon has not attempted to report these troubles on a disaggregated basis.

Verizon has reviewed recent performance measurement results for UNE special services in Massachusetts in light of the Commission's discussion of high capacity loops in the Kansas/Oklahoma Order (¶ 213). The Commission noted that the volume of high capacity loops in Kansas/Oklahoma was low, and that they comprised only a small proportion (9.6% in Oklahoma and 15.7% in Kansas) of recent loop volume in those states.

The same is true to an even greater extent in Massachusetts. For example, the Commission noted that SWBT received 210 orders for DS1 loops in Oklahoma during the four month period of July through October. (¶ 213, n. 616) That is more than the total number of observations for DS1 loops for measure PR-2-07 (Average Interval Completed – DS1) for the five month period September through January in Massachusetts. (In Massachusetts, observations for PR-2-07 for the five month period total 176.) And high capacity loops in Massachusetts comprise only 0.8% of total UNE loops in Massachusetts – just a fraction of a percent – and a far smaller proportion than in Kansas or Oklahoma. Given Verizon's strong performance on unbundled loops generally, the Commission should not draw any conclusions about Verizon's overall UNE loop performance from such a tiny portion of total loops.

In any event, it is difficult to draw any firm conclusions regarding Verizon's performance with respect to DS1 loops because the volumes are so low. Moreover, in some cases, factors outside of Verizon's control appear to affect the reported results. For example, Verizon examined a sample of the January orders that were included in measure PR-1-07 (Average Interval Offered). Verizon discovered that the vast majority of the orders should have been "X" coded because the CLEC asked for an interval longer than the standard interval. Because the orders were

incorrectly "W" coded, however, they were included in the measurement calculation and skewed the reported results.

For measure PR-4-01, Verizon missed 15.5% of installation appointments, on average from September through January. This is far better than the results reported in the Kansas/Oklahoma Order (47.8% missed installation commitments in Oklahoma, and 33.1% in Kansas). ¶ 213, n. 615.

Verizon has also examined key maintenance measures for special services, although the Commission did not discuss any measures of loop quality or maintenance performance for SWBT's high capacity loops in Kansas and Oklahoma. As noted above, Verizon does not report separate DS1 performance for the maintenance measures. Nevertheless, Verizon's performance on key measures for CLECs on total specials shows that it is at or close to parity.

The overall reliability of UNE specials can be determined by looking at measure MR-2-01 (Network Trouble Report Rate), the total trouble report rate on UNE specials – *i.e.*, the relative number of problems experienced on UNE specials in service. On average, for the months of September through January, the total trouble report rate for Verizon was .26 and for CLECs was 1.29. These are very low trouble report rates, showing that UNE specials are very reliable, and the difference of approximately one percentage point is not competitively significant.

When customers do experience trouble, Verizon repairs troubles for CLECs as quickly as it repairs troubles for its own customers. For the months September through January, the Mean Time to Repair (measure MR-4-01) for Verizon was 8.38 hours and for CLECs was 8.40 hours.

Please let me know if you have any questions. The twenty-page limit does not apply as set forth in DA 01-106.

Sincerely,

Dee May

Attachment

cc: E. Einhorn
K. Farroba
P. Goyal
C. Libertelli
S. Pie

LFACS maintains the following information on a loop basis:

- Status of assembled facility (working, defective, spare, etc.)
- Receive/Transmit Indicator (indicator returned on 4-wire circuits to denote the receive side and the transmit side of the circuit)
- Single Subscriber Carrier Indicator ***
- Per Segment (1-9 segments per loop)
  - Cable identifier
  - Pair Identifier
  - Binding Post Number
  - Terminal Identifier
  - Count Qualification Code **
  - Count Despecialization Code **
  - Transmission Medium Type ***
  - Loop Makeup Status @
  - Length Unit ***
  - Load Point Number, Null if Non-loaded ***
  - Load Coil Type ***
  - End Section (the distance from the central office to the first load coil) ***
  - Load Spacing (up to 15 occurrences) ***
  - Build Out (1-2 per Loop Make Up- infrequent appearances in VZ) ***
    - Build Out Capacity
    - Build Out Aggregate
    - Build Out Offset
  - Splice Information(1-10 times per Loop Make Up-Cable sections) ***
    - Gauge
    - Length
    - Type of cable (underground, buried, aerial)
    - Capacitance
    - Bridge Tap Offset (indication if gauge length is bridge tap)

Legend:

** Code used to facilitate selection of appropriate facilities that will support specific services. For example counts/loops capable of supporting ISDN are labeled A1. This may assist in the automated assignment of facilities for particular services. Codes are developed by the individual ILECs based on their own parameters. This information is not returned to the CLEC because it is geared to retail service offerings.

*** Included in loop qualification/loop makeup data returned to CLEC in both interim and long-term process

@ Not reported. Provides an indication as to whether a Loop Makeup is available. In both the interim and long-term solution if one is available it will be provided to the CLEC. If none or incomplete, an insufficient information message is returned to the CLEC.